

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

PleasrDAO,

Plaintiff

v.

Martin Shkreli,

Defendant

Case No. 1-24-cv-04126-PKC-MMH

I, Martin Shkreli, hereby certify and state under penalty of perjury as follows:

1. I am the Defendant in the above-captioned action.
2. I submit this declaration in response to the Court's Order entered on November 20 2024, which requires that I provide an inventory and account that includes the nature and results of my search efforts for any remaining copies of *Once Upon a Time in Shaolin* (the "Musical Work") that may be in my possession, for transmission of the Musical Work to any individual(s), for the names and contact information of the individuals to whom I may have distributed the Musical Work, for the date and method of such distribution; and for the amounts, source, date, and nature of any proceeds, revenues, profits, or other financial benefits made by me from distributing or playing the Musical Work.
3. I have searched my devices, electronic accounts, and other personal effects, and have identified electronic copies of fifteen tracks of the Musical Work, which have been sequestered and turned over to my attorneys, as previously confirmed.
4. I have searched all of my devices, electronic accounts, and other personal effects, with the following search terms:

- a. Any iteration of the Wu-Tang Clan or Album title, including “Wu-Tang,” “Wu Tang,” “Wutang,” “Wu,” “WTC,” “Shaolin,” and “OUATIS.”
- b. Any generic reference to the Album’s first disk, including “First CD,” “First Album,” “First Disk,” “Disk 1,” or “Disk One.”
- c. All track titles from the Album’s first disk, including “Magnificent Butchers,” “Staple Town,” “Stone Him,” “Kareem,” “Cycling Swords,” “99 Supreme,” “Stone Finger,” “Weeping Tiger,” “Brother Jozef,” “The Ninja,” “Swine,” “Dirt Bomb Niggas,” “Hail Snow,” and “Rainy Dayz.”
- d. Any generic reference to the aforementioned tracks, including the phrases ((“song” OR “track”) w/1 (“1” OR “one” OR “1st” OR “first” OR “2” OR “two” OR “2nd” OR “second” OR “3” OR “three” OR “3rd” OR “third” OR “4” OR “four” OR “4th” OR “fourth” OR “5” OR “five” OR “5th” OR “fifth” OR “6” OR “six” OR “6th” OR “sixth” OR “7” OR “seven” OR “7th” OR “seventh” OR “8” OR “eight” OR “8th” OR “eighth” OR “9” OR “nine” OR “9th” OR “ninth” OR “10” OR “ten” OR “10th” OR “tenth” OR “11” OR “eleven” OR “11th” OR “eleventh” OR “12” OR “twelve” OR “12th” OR “twelfth” OR “13” OR “thirteen” OR “13th” OR “thirteenth” OR “14” OR “fourteen” OR “14th” OR “fourteenth” OR “15” OR “fifteen” OR “15th” OR “fifteenth”)).

5. I searched the following devices and accounts: a Maingear Computer, an Alienware computer, my current YouTube account (@realmartinshkreli), and my current Twitter/X account (@MartinShkreli).

6. I was unable to access my email accounts [REDACTED] (also used as [REDACTED] due to re-naming of the company), and

██████████, my former Twitter account (██████████), and my former YouTube accounts. I have exhausted all reasonable efforts to regain access to these electronic accounts, and have been unable to search them. I do not recall that, other than as described herein, I used any of these inaccessible accounts to disseminate, share, or stream the Musical Work.

7. After searching all of my devices and accounts as described herein, I have identified the following individual recipients of the Musical Work:

Recipient (Name)	Method of transmission	Contact Information
Taylor Emerick	Email or Text Message	██████████
Michael Smith	Email	Unknown- Defendant searched for emails with Pyros Pharmaceuticals, Mr. Smith's last known employer, which returned no results.
Edwin Urrutia	Email	██████████
Patrick Crutcher	Email	Unknown- Defendant searched for emails with AlmataBio, Mr. Crutcher's last known employer, which returned no results.
Akeel Mithani	Email	██████████
Sophia Fox	Email	Unknown- Defendant no longer has contact information for Ms. Fox as they are no longer in contact with one another.
Stephen Thomas	Email	Unknown- Defendant searched for emails with AlmataBio, Mr. Thomas's last known employer, which returned no results.
Alexander J. Bilzerian	Email	██████████
Kevin Mulleady	Physical copy (USB flash drive)	██████████

8. It is possible that one of the many people who viewed, heard, or otherwise accessed the Musical Work via my social media recorded the Musical Work and retains a copy of the same.

9. To the best of my knowledge, the below list contains each and every time that I engaged in “Permitted Use” of the Musical Work as defined in the Original Purchase Agreement by playing at least a part of the Musical Work online, together with my best recollection of the tracks that were shared, identified by number, and the platform on which the Musical Work was played:

Date	Track(s) Played	Platform
approximately October 1, 2015	1, 2	LiveStream on Youtube
November 9, 2016	1, 2	LiveStream on Discord
approximately June 18, 2022	1, 2, 3	LiveStream on Youtube
June 9, 2024	1-15	Livestream on X (Spaces)

10. I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED on Jan 15, 2025.


box SIGN 4LR2RJQL-4ZX6RR8Z

Martin Shkreli

Defendant